



**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

JANE DOE 2,	)	
	)	
Plaintiff,	)	
	)	
V.	)	No. 3:23-cv-00582
	)	
JIMMIE ALLEN, AADYN’S DAD	)	JUDGE ALETA A. TRAUGER
TOURING, INC., CHARLES HURD	)	
and JOHN DOES 1-100,	)	JURY DEMAND
	)	
Defendants.	)	

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**DEFENDANTS ALLEN AND AADYN’S DAD TOURING, INC.’S  
MOTION TO AMEND FIRST AMENDED ANSWER AND COUNTERCLAIM**

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Defendants Jimmie Allen (“Allen”) and Aadyn’s Dad Touring, Inc. (“ADT”) (collectively, “Defendants”) respectfully request to amend the First Amended Answer and Counterclaim and file the Second Amended Answer and Counterclaim attached hereto. *See* Exhibit A (copy of Second Amended Answer and Counterclaim), Exhibit B (redlined copy of Second Amended Answer and Counterclaim). In support thereof, Defendants state as follows:

1. On September 12, 2024, Defendants’ First Amended Answer and Counterclaim was filed in response to Plaintiff Jane Doe 2’s First Amended Verified Complaint. ECF No. 53.
2. The First Amended Answer contained a counterclaim for conversion. *See* First Amended Counterclaim, ¶¶ 1-44.
3. The amended counterclaim included a statement that Allen did not have possession of the camera phone at the time of filing. *See id* at ¶ 37.